

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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) **Civil Action No. 03. MDL 1570 (GBD)**  
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**DEFENDANT INTERNATIONAL ISLAMIC RELIEF ORGANIZATION’S RULE  
26(a)(1) AMENDED INITIAL DISCLOSURES**

Defendant International Islamic Relief Organization (“IIRO”), by and through its undersigned counsel, makes the following Amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). These Amended Initial Disclosures are based on information reasonably available to IIRO as of the date hereof. The disclosures herein are provided without prejudice to the rights of IIRO to identify additional witnesses or evidence. Further, IIRO reserves the right to supplement these disclosures.

**I. Individuals With Relevant Discoverable Information**

The following individuals are likely to have discoverable information that IIRO may use to support its defenses. IIRO does not consent to any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by IIRO and does not consent to any other communication prohibited by any applicable rule of professional conduct.

**1. Dr. Adnan Khalil Basha**

*Former Secretary General – IIRO*

Address: Jeddah, Saudi Arabia

Contact: Can be reached through his counsel

Subject Matter: Among other things, Dr. Basha may have information regarding IIRO policies, procedures and operations; IIRO’s relationship to or affiliation with other entities; and IIRO’s defenses.

**2. Mr. Ammar Shawwat**

*Oracle Financial Consultant – IIRO Head Office, Jeddah*

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: IIRO custodian of documents

**3. Mr. Muhammad Hillis**

*Coordinator – IIRO Head Office, Jeddah*

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Hillis may have information about IIRO's branch office operations and its defenses.

**4. Mr. Omar Bashir Khalid**

*Deputy Internal Auditor – IIRO Head Office, Jeddah*

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Khalid may have information relating to IIRO's internal audits.

**5. Mr. Saeed Al-Sarahaan**

*Financial Controller – IIRO Head Office, Jeddah*

Address: IIRO Head Office, Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Sarahaan may have information relating to IIRO's financial controls.

**6. Mr. Saleh Al-Dhibani**

*Former Urgent Relief Supervisor – IIRO Head Office, Jeddah*

Address: Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Dhibani may have information relating to IIRO Albania and Kosovo operations and IIRO Eastern Province Regional Office operations.

**7. Dr. Abdul Hamid Al-Mujil**

*Former Executive Director – IIRO Eastern Province Regional Office*

Address: Imam Abdulrahman Bin Faisal University, College of Architecture and Planning, Engineering Department, Dammam, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Dr. Al-Mujil may have information relating to IIRO Eastern Province Regional Office operations.

**8. Mr. Mahmud Said**

*External Auditor – M. Said & Co Chartered Certified Accountants*

Address: 137 Blackstock Rd, London N4 2JW, United Kingdom

Contact: Can be reached through counsel

Subject Matter: Mr. Said may have information relating to IIRO Indonesia operations.

**9. Mr. Fahad bin Mohammad Sanad Al-Harbi**

*Former Director – IIRO Branch Office, Indonesia*

Address: MWL Branch Office, Jakarta, Indonesia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Harbi may have information relating to IIRO Indonesia operations.

**10. Mr. Faiz Wardy**

*Secretary – IIRO Branch Office, Indonesia*

Address: IIRO Branch Office, Jakarta, Indonesia

Contact: Can be reached through counsel

Subject Matter: Mr. Wardy may have information relating to IIRO Indonesia operations.

**11. Mr. Abdelhadi Daguit**

*Former Director – IIRO Branch Office, Philippines*

Address: Manila, Philippines

Contact: Can be reached through counsel

Subject Matter: Mr. Daguit may have information relating to IIRO Philippines operations.

**12. Mr. Rahmatullah Nazir Khan Gari**

*Former Director – IIRO Pakistan and Bangladesh*

Address: Jeddah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Gari may have information relating to IIRO Pakistan and IIRO Bangladesh operations.

**13. Mr. Abdu Atain**

*Director – IIRO Branch Office, Pakistan*

Address: IIRO Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Atain may have information relating to IIRO Pakistan operations.

**14. Mr. Muhammad Javid Butt**

*Accountant – MWL Branch Office, Pakistan*

Address: MWL Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Butt may have information relating to IIRO Pakistan financials.

**15. Mr. Moayid Al-Butayri**

*Former Director – IIRO Branch Office, Pakistan*

Address: Al Khobar, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Butayri may have information relating to IIRO Pakistan operations.

**16. Mr. Qari Nooruzaman Shurafat**

*Quran Program Supervisor – IIRO Branch Office, Afghanistan*

Address: IIRO Branch Office, Kabul, Afghanistan

Contact: Can be reached through counsel

Subject Matter: Mr. Shurafat may have information relating to IIRO Peshawar, Pakistan and Afghanistan operations.

**17. Mr. Abdulrauf Khalaf Al-Sharman**

*Director – IIRO Branch Office, Bosnia & Herzegovina*

Address: IIRO Branch Office, Sarajevo, Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Sharman may have information relating to IIRO Bosnia operations.

**18. Mr. Mustafa Hussain Omar**

*Accountant – IIRO Branch Office, Bosnia & Herzegovina*

Address: IIRO Branch Office, Sarajevo, Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Omar may have information relating to IIRO Bosnia operations and financials.

**19. Mr. Ismat Al-Bahiti**

*Director – IIRO Balkans Region Offices*

Address: IIRO Branch Office, Pristine, Kosovo

Contact: Can be reached through counsel

Subject Matter: Mr. Bahiti may have information relating to IIRO Balkans operations.

**20. Mr. Ibrahim Fadlallah**

*Administrator – IIRO Branch Office, Kosovo*

Address: IIRO Branch Office, Pristine, Kosovo

Contact: Can be reached through counsel

Subject Matter: Mr. Fadlallah may have information relating to IIRO Kosovo operations.

**21. Mr. Saad Al-Obaidi**

*Former Director – IIRO Branch Office, Kosovo*

Address: Bosnia & Herzegovina

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Obaidi may have information relating to IIRO Kosovo operations.

**22. Mr. Edmond Saliu**

*Program Coordinator – IIRO Branch Office, Albania*

Address: IIRO Branch Office, Tirana, Albania

Contact: Can be reached through counsel

Subject Matter: Mr. Saliu may have information relating to IIRO Albania operations.

**23. Mr. Mohamed Zeqiri**

*Program Coordinator – IIRO Branch Office, Macedonia*

Address: IIRO Branch Office, Tetovo, Macedonia

Contact: Can be reached through counsel

Subject Matter: Mr. Zeqiri may have information relating to IIRO Macedonia operations

**24. Any witness on Plaintiffs' or Defendants' witness lists.**

## **II. Categories of Relevant Documents**

IIRO has already produced copies of documents, in its possession, custody, or control that it may use to support its defenses. *See* IIRO 000001 – IIRO 341994.

IIRO's disclosures are made subject to and without waiving the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action.

## **III. Computation of Damages**

IIRO has not asserted a claim for damages against any other party in this action.

## **IV. Insurance**

IIRO is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

March 9, 2018

Respectfully submitted,

/s/ Aisha E. Bembry

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Organization*